

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**UNION SPRINGS TELEPHONE
COMPANY, INC.,**

Plaintiff,

V.

T-MOBILE USA, INC.,

Defendant.

CASE NO.: 2:06-CV-474-MEF

MOTION TO EXTEND DEADLINES

Comes now counsel for Defendant, T-Mobile USA, Inc., and moves this Honorable Court for a two-week extension of the deadlines set forth by this Court in its Order dated June 27, 2006. This Court has ordered Defendant to file its response to Plaintiff's Motion to Remand on or before July 12, 2006. Defendant respectfully requests an extension of this filing deadline until July 26, 2006, and an extension for Plaintiff's reply until August 2, 2006. As grounds for this request, Defendant states as follows:

1. Counsel for the Defendant is scheduled to leave on vacation on June 30, 2006, and will not return until July 11, 2006.
2. The parties to this action are attempting to resolve this matter amicably, and an additional two weeks would greatly aid in the settlement efforts.
3. Plaintiff's counsel has informed counsel for the Defendant that they have no objection to the granting of a two week extension in this matter.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that this Honorable Court will grant a two week extension in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Peter S. Fruin', is written over a horizontal line.

Peter S. Fruin (FRU002)
Joshua D. Jones (JON147)

Attorneys for Defendant T-Mobile

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Removal has been served upon the following counsel of record to this proceeding by placing a copy of same in the United States Mail, properly addressed and first-class postage prepaid this 29th day of June, 2006:

Mark D. Wilkerson
Amanda C. Carter
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OF COUNSEL